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August 23, 2004

Ms. Carole J. Washburn, Secretary
Washington Utilities & Transportation Commission
1300 South Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UG-011073, Gas Companies-Safety, Chapter 480-93 WAC
Comments and Questions Regarding Draft Rules Changes
Notice of Opportunity to Submit Comments, Posted July 23, 2004

Dear Ms. Washburn:

As an interested party which constructs and operates pipelines in the state of Washington, I have the following comments regarding the draft WAC480-93 gas safety rules (comments are italicized):

Proposed Rule 480-93-005 Definitions: In Part (21) of the proposed rule, it is stated “**Sniff Test**” means a qualitative test utilizing both threshold and readily detectable methods for determining proper concentrations of odorant.” *I am unaware that “threshold” and/or “readily detectable” methods of performing a “sniff test” are industry recognized methods. I have seen the terms used by manufacturers of “sniff test” equipment, but the test methods detailed applied specifically to that unique piece of equipment. I suggest that the WUTC staff describe in detail the methods that they want operators to use when performing a sniff test, or refer to a published industry standard test method. The “sniff test” procedures described should be equipment non-specific in nature*

There are a number of other typographical errors in the proposed rules but I assume that those errors will be corrected in the final edit. I appreciate the opportunity to be allowed to comment on the proposed rules. The comments are those of Industrial Gas Services, Inc. alone and of no other entity. I can be contacted at the address and telephone numbers listed at the top of this document if you or your staff need clarification of my comments.

Very Truly Yours,

INDUSTRIAL GAS SERVICES, INC.

Steven E. Oxford

Vice President, Operations

Transmitted electronically to records@wutc.wa.gov